

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CAROL KULIG,

Plaintiff,

v.

MIDLAND FUNDING, LLC,  
MIDLAND CREDIT MANAGEMENT, INC.,  
ENCORE CAPITAL GROUP, INC.  
formerly MCM CAPITAL GROUP, INC.,  
AMANDA PEREZ,

Defendants.

No. 13-CV-4715 (PKC)

**Plaintiff's Petition for Fees and Costs**

Upon the accompanying declarations in support and the exhibits annexed thereto, and for the reasons set forth in the accompanying Memorandum of Law, Plaintiff petitions for an award of fees and costs under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k, and under the parties' "Confidential Settlement Agreement and Release of Claims," which Plaintiff is simultaneously moving to file under seal, in the following amounts:

1. Bromberg Law Office, P.C. – Fees: \$13,520; Costs: \$150;

2. National Consumer Law Center – Fees: \$85,433.75; Costs: \$1,892.56; and
3. Law Office of Ahmad Keshavarz – Fees: \$132,436.88; Costs: \$5,611.14.

Dated: June 22, 2015  
New York, New York

PLAINTIFF CAROL KULIG

By: /s/ Brian L. Bromberg  
Brian L. Bromberg

Bromberg Law Office, P.C.  
26 Broadway, 21st Floor  
New York, NY 10004  
(212) 248-7906

**Certificate of Service**

I, Brian L. Bromberg, an attorney, hereby certify that on June 22, 2015, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants:

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Dated: New York, New York  
June 22, 2015

/s/ Brian L. Bromberg  
Brian L. Bromberg